

1 Viktor Borisovich Tairov
2 A# [REDACTED]
3 Northwest Detention Center
4 1623 East J Street
5 Tacoma, WA 98421-1615

6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 VIKTOR BORISOVICH TAIROV,

10 Petitioner,

11 v.

12 PAMELA BONDI, Attorney General of
13 the United States; KRISTI NOEM,
14 Secretary, United States Department of
15 Homeland Security; CAMMILLA
16 WAMSLEY, Seattle Field Office Director,
17 United States Citizenship and Immigration
18 Services; WARDEN of Immigration
19 Detention Facility; and the United States
20 Immigration and Customs Enforcement,

21 Respondents.

NO. C

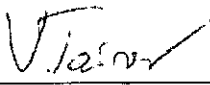
REQUEST FOR APPOINTMENT OF
COUNSEL

22 Petitioner Viktor Borisovich Tairov hereby requests that the Court appoint the
23 office of the Federal Public Defender for the Western District of Washington, or such
24 other counsel as the Court may deem appropriate, to represent him in this matter.
25 Petitioner does not have the financial resources to retain counsel as he is presently in
26 custody. For these reasons, and because the present petition presents novel and complex
issues of law, appointment of counsel would serve the interests of justice. Many other
ICE detainees are or will be raising similar habeas challenges against respondents, and

1 this Court will benefit from the contributions of experienced, federal counsel in
2 examining these claims. In addition, if an evidentiary hearing is necessary in this case,
3 petitioner will need the assistance of counsel for such a hearing.

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5 DATED this 7 day of August, 2025.

6 Respectfully submitted,

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8
9  [SIGN NAME]
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